

ANDREW G. GREENBERG, ESQ.
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Attorney for Debtor

IN RE: UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Clyde S. Green, Jr., Case No.: 24-22320 (JKS)

Debtor. **CERTIFICATION OF DEBTOR**

Clyde S. Green, Jr., of full age, hereby certifies as follows:

1. I am the debtor in connection with the above captioned matter and make this Certification in support of the within Motion to Extend the Automatic Stay.
2. I filed the within case on December 16, 2024 to stay a Sheriff's Sale scheduled with respect to my home.
3. My father previously owned the home and I inherited the home when he passed away in 2022. The home is subject to a reverse mortgage which became due when he passed away. PHH Mortgage Corporation ("PHH") is the mortgagee.
4. I filed a prior Chapter 13 case on April 29, 2024 referenced by case number 24-14389. The plan in that case required me to refinance the reverse mortgage on my home. I was unable to do so and did not make all of the required plan payments. As a result, the case was dismissed on September 3, 2024.
4. Case number 24-14389 was the only case dismissed within the 12 month period before the within case was filed.
5. Due to the prior dismissal, the automatic stay with respect to the within case will expire on January 15, 2025, unless extended by the Court.
6. According to Zillow, my home has a value of \$969,900.00.
7. Based upon the Proof of Claim filed by PHH in my prior case, the amount

required to payoff the claim is \$845,308.16.

8. As a result of the foregoing, I respectfully submit that there is equity in the property.

9. The plan in this case, which will be filed shortly, will state that I will sell the property by June 16, 2025.

10. Based upon the foregoing change in my circumstances (ie. that I will sell the property), I respectfully submit that the within case was filed in good faith and request that the Court enter an Order Extending the Automatic Stay as to all creditors served with the Motion.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: December 19, 2024

/s/ Clyde S. Green, Jr.
CLYDE S. GREEN, JR.